

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KNIGHT FIRST AMENDMENT INSTITUTE
AT COLUMBIA UNIVERSITY,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, U.S. CUSTOMS AND BORDER
PROTECTION, U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT, U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES, U.S. DEPARTMENT OF
JUSTICE, and U.S. DEPARTMENT OF
STATE,

Defendants.

No. 1:17-cv-07572-ALC

NOTICE OF ERRATA AND CORRECTIONS

PLEASE TAKE NOTICE THAT Plaintiff, the Knight First Amendment Institute at Columbia University (the “Knight Institute”), hereby informs the Court of errata identified in its Memorandum of Law in Support of Cross-Motion for Summary Judgment, and in Opposition to Defendants’ Motion for Summary Judgment (“Memorandum”), ECF No. 105; Declaration of Carrie DeCell in Support of Plaintiff’s Cross-Motion for Summary Judgment (“Declaration”), ECF No. 106; and Exhibit B to the Declaration (“Exhibit B”), ECF No. 106-2, electronically filed on April 15, 2019.

The Memorandum, Declaration, and Exhibit B reference a record initially released by Defendant Immigration and Customs Enforcement (“ICE”) on March 7, 2018, titled “Meeting Minutes for Homeland Security Investigations Law Division (HSILD) All-Hands Meeting on Aug.

17, 2017” (2018-ICAP-00118, at 281–87). *See* Memorandum, at 8 n.7, 12; Declaration ¶ 17; Exhibit B, at 1–8. The Knight Institute challenged this record pursuant to FOIA Exemption 5, 5 U.S.C. § 552(b)(5). By email on March 22, 2019, however, Defendants’ Counsel had sent the Knight Institute a supplemental release of this record with fewer Exemption 5 redactions. Because the Knight Institute’s filings were based on the initial release of this particular record, and in light of ICE’s supplemental release, the Knight Institute withdraws its challenge to the Exemption 5 withholdings in this specific record.

ECF Nos. 105 and 106 are hereby withdrawn. The Knight Institute is concurrently filing a corrected Memorandum and Declaration with accompanying exhibits, which correct this oversight and acknowledge ICE’s supplemental release, making no other changes. The Knight Institute anticipates that the corrected Memorandum and Declaration will be filed as ECF Nos. 108 and 109, respectively.

The Knight Institute has informed Defendants’ Counsel of its intent to file this notice along with the corrected Memorandum and Declaration.

Dated: April 16, 2019

Respectfully submitted,

/s/ Carrie DeCell

/s/ Megan Graham

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